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August 11, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Re: Armstrong Digital Services, Inc. (“Armstrong Telephone”) /
 Subscriber Notification Report, WC Docket No. 05-196**

Dear Ms. Dortch:

We write on behalf of Armstrong Telephone. This Report summarizes Armstrong Telephone’s compliance with the customer notification requirements of 47 CFR § 9.5.¹ We also provide some background information on Armstrong Telephone’s voice service. Armstrong Telephone’s service differs significantly from typical VoIP service and provides more robust E911 services.

Armstrong Telephone’s Voice Services. Armstrong Telephone provides its voice services over cable plant owned by its affiliate, Armstrong Utilities, Inc., and telecommunications facilities owned by MCI. Customers are not required to subscribe to Internet services to receive the voice services. Armstrong Telephone configures its customer premise facilities as follows:

The Multimedia Terminal Adaptor (“MTA”). Armstrong Telephone installs an MTA at the customer’s premises, which it connects to the customer’s inside wiring. The MTA is mounted to an inside wall at the customer’s premises whenever appropriate. The MTA has a backup battery that provides up to 8 hours of backup power in the event of a power outage.

The traffic. The subscriber originates a call over a traditional telephone. The call goes as analog traffic to the MTA, which converts the call to IP. The IP traffic travels over Armstrong Utilities, Inc.’s cable plant to its switch. The switch rates and routes the call and the call is transferred to a trunking gateway. At the trunking gateway, the call is converted to traditional telephone TDM circuits

¹ Armstrong Telephone is submitting a Motion to Accept Late-Filed Subscriber Notification Report concurrently with this report.

(DS0, DS1, DS3) and handed off to MCI to transport over their traditional TDM network. The call never traverses the Internet.

PSAP and Subscriber Location Information. MCI's network has trunking to the PSAP for E911 services. Armstrong Telephone provides the same subscriber information to the PSAP as any traditional voice services provider.

Armstrong Telephone's voice service is designed and marketed as a fixed, at-home service. Consequently, Armstrong Telephone's subscriber location information is not subject to the same concerns as that of a portable VoIP service.

Armstrong Telephone's subscriber notification report. Below, we provide information on Armstrong Telephone's customer notification and acknowledgement status.

Advisories of circumstances when E911 service may not be available. At the time of installation, Armstrong Telephone provides its customers with a written advisory that warns customers of the circumstances under which its E911 services may not be available, or may be limited in comparison to traditional E911 service. Before their service is turned up, the customers are required to read and affirmatively acknowledge, via initialing the warning form, that they have understood the advisory.

Percent of subscribers from whom Armstrong Telephone has obtained acknowledgements. Armstrong Telephone has obtained signed acknowledgements from over 96% of its voice service subscribers. Armstrong Telephone expects to receive signed acknowledgements from 100% of its voice service subscribers by August 29, 2005.

Distribution of warning stickers. Armstrong Telephone is in the process of contacting vendors about production of E911 warning stickers for customer premises equipment.

Percent of subscribers not provided with advisories or warning stickers. As of the date of this report, Armstrong Telephone has provided all its customers with written advisories. It has not yet provided its subscribers with warning stickers because it is in the process of obtaining the stickers.

Armstrong Telephone's planned actions toward customers who do not affirmatively acknowledge having received and understood the advisory. Armstrong Telephone will warn any customer from whom it has not received an affirmative acknowledgement that Armstrong Telephone will disconnect their services if the acknowledgements are not received by August

29, 2005. On August 30, 2005, Armstrong Telephone will disconnect any customer from whom it has not received an affirmative acknowledgement.

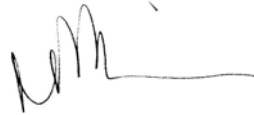
Recordkeeping. Armstrong Telephone maintains its customers' acknowledgements at its office located at One Armstrong Place, Butler, PA 16001, or its Call Center located at 437 N. Main, Butler, PA 16001. The records will be maintained for a minimum of one year after the customer terminates service with Armstrong Telephone.

E911 Compliance personnel contact information. Armstrong Telephone's E911 compliance contact is:

Name: David Jamieson
Title: General Counsel
Address: One Armstrong Place, Butler, PA 16001
Phone: (724) 283-0925
Email: djamieson@agoc.com

If you have any further questions, please contact me.

Regards,

A handwritten signature in black ink, appearing to read 'NP', followed by a horizontal line.

Nicole Paolini-Subramanya
Attorney for Armstrong Telephone